

	<p>California Public Utilities Commission <i>Mitigation Monitoring, Compliance, and Reporting Program</i></p>
	<p>CalPeco 625 and 650 Electrical Line Upgrade Project</p> <p>Compliance Status Report: 002</p> <p>September 15, 2015</p>

SUMMARY

The California Public Utilities Commission (CPUC) is responsible for overseeing implementation of the mitigation measures set forth in the Final Environmental Impact Statement (EIS)/EIS/Environmental Impact Report (EIR) for the CalPeco 625 and 650 Electrical Line Upgrade Project. The CPUC has established a third-party monitoring program and adopted a Mitigation Monitoring, Compliance, and Reporting Program (MMCRP) to ensure that measures approved in the FEIS/EIS/EIR to mitigate or avoid impacts are implemented in the field. This MMCRP status report is intended to provide a description of construction activities for the project, a summary of site inspections conducted by the CPUC’s third-party monitors, the compliance status of mitigation measures required by the MMCRP, and anticipated construction activities. This compliance status report covers construction activities from August 23 through September 5, 2015.

MITIGATION MONITORING, COMPLIANCE, AND REPORTING

Site Inspections/Mitigation Monitoring

A CPUC third-party environmental compliance monitor conducted site observations in areas of active construction. Observations were documented using site inspection forms, and applicable applicant proposed measures (APMs) and mitigation measures (MMs) were reviewed in the field.

Implementation Actions

CalPeco’s biological and cultural monitors were present during project construction activity (except as noted below), consistent with APM-BIO-1, APM-BIO-21, and APM-CUL-1. Environmental monitors inspected excavated holes in accordance with APM-BIO-22, rescuing one jackrabbit that had fallen into an excavated pole hole. Project work areas were kept free of trash/debris, consistent with APM-BIO-33. Project best management practices (BMPs) were maintained along the ROW, consistent with APM-SOILS-1. Timber matting along the right-of-way (ROW) within Martis Valley was maintained, consistent with the work covered under NTP-2 and the project’s 401 Water Quality Certification. Water

trucks were on-site to control fugitive dust, as required under APM-AQ-1. Salvaged topsoil stockpiles were covered as required under APM-BIO-23.

Work area boundary fencing was maintained along the ROW to identify the extent of approved work area. Exclusion fencing was maintained at appropriate locations along the ROW for identified sensitive resources and to delineate cultural sites. Signs were maintained along the ROW to identify weed cleaning stations (APM-BIO-5), speed limits (APM-AQ-7), and sensitive resource exclusion areas (APM-BIO-26). Refueling areas were identified with signs and located 100 feet from waterways (APM-WQ-1).

In compliance with APM-BIO-26, work areas were clearly marked with fencing, staking, flagging, or another appropriate material. Silt fencing was installed along the work area boundary for tree removal areas. All project work and equipment was confined to delineated work areas. In compliance with APM-BIO-5, vehicles and equipment arrived at the project area clean and weed-free and were inspected by the on-site environmental monitor for mud or other signs that weed seeds or propagules could be present prior to use in the project area. In compliance with APM-BIO-1, APM-CUL-7, APM-CUL-10, and APM-HAZ-1, Liberty Utilities continued to implement a Worker Environmental Awareness Program (WEAP) for all personnel entering the project area. Liberty Utilities provided the required environmental awareness training to approximately 28 personnel during the reporting period.

Mitigation Measure Tracking

Mitigation measures applicable to the construction activities were verified in the field and documented in the CPUC's mitigation measure tracking database. A complete list of mitigation measures and applicant proposed measures is included in the project's MMCRP, as referenced in the Decision for the CalPeco 625 and 650 Electrical Line Upgrade Project, as adopted by the CPUC on March 27, 2015 (Decision D.15-03-020).

Compliance Status

Pre-construction mitigation measures have been completed as indicated in Notice to Proceed (NTP) No. 2 (Attachment B). Applicable mitigation measures were verified during site inspections and were determined to be implemented in accordance with the MMCRP, except as discussed below.

In the previous Compliance Status Report (#001), four non-compliance issues were summarized and the report noted that confirmation that corrective actions had been implemented in the field would be verified during subsequent monitoring visits. The following summarizes the status of the four non-compliance issues, based on field observations:

- Cut tree marking paint: During a compliance monitoring visit on August 28, 2015, Dudek monitors confirmed that road-side tree marking paint had been covered with black paint. This

corrective action was identified by Liberty Utilities to address conditions inconsistent with the measures outlined in APM-SCE-1.

- Topsoil salvage piles: During a compliance monitoring visit on August 28, 2015, Dudek monitors confirmed that topsoil salvage piles has been covered. This corrective action was identified by Liberty Utilities to address conditions inconsistent with the measures outlined in APM-BIO-23.
- Timber matting covering excavated holes: During a compliance monitoring visit on August 28, 2015, Dudek monitors confirmed that alternative materials were in place covering excavated holes. This corrective action was identified by Liberty Utilities to address conditions inconsistent with the work covered under NTP-2 and the project's 401 Water Quality Certification.
- Gaps in bridge decking: During a compliance monitoring visit on August 28, 2015, Dudek monitors did not observe sediment on temporary bridge decks in Martis Valley, nor did monitors observe sediment entering waterways. As a corrective action, Liberty Utilities identified that they would use shovels and/or brooms to clear the soil from the matting. This condition will continue to be verified during subsequent monitoring visits.

In addition to the aforementioned non-compliance issues, Liberty Utilities notified the CPUC and Dudek of a non-compliant action that occurred on the project site on August 25, 2015. The CPUC and Dudek were notified on August 27, 2015 that construction crews moved approximately 25 boulders out of the 20-foot-wide limited work area between Poles #291073 and #291081. This area is mapped as a cultural site (CA-PLA-006) and no archeological monitor was present during the activity, inconsistent with APM-CUL-1. Upon notification of the ground-disturbing activity, the project's archeological monitor halted construction activity in the area, consistent with the protocols outlined in the project's Cultural Resources Protection, Monitoring and Unanticipated Discovery Plan, and closed the area so that an assessment could be conducted in coordination with the United States Forest Service (USFS) archaeologist representative. The assessment protocol was prepared by the project's archeological monitor and provided to the CPUC on August 27, 2015 and outlined the approach for mapping, documenting, and testing/sampling the site to determine whether archaeological resources were present. The assessment occurred on August 28, 2015, in coordination with the USFS's archaeologist representative. The CPUC was notified on September 1, 2015 that the USFS had concluded that the area could be re-opened to construction activity and that all construction activity in this area will require that an archeological monitor is present. This will be verified during subsequent monitoring visits.

Liberty Utilities notified the CPUC that, on September 4, 2015, ground disturbance from a rubber-tired backhoe bucket truck occurred beyond the limits of the work area, approximately 5 feet outside of the marked work area boundary at Pole #291082. The CPUC and Dudek were notified on September 10, 2015. Liberty Utilities was notified on September 15, 2015 that any work occurring outside of fenced work areas would require prior approval via the minor project refinement process outlined in the

project's MMCRP. As a corrective action, Liberty Utilities stated they will restore the disturbed area, as outlined in the project's Habitat Restoration Plan.

Liberty Utilities notified the CPUC that, on September 2, 2015, approximately 1 quart of hydraulic fluid was spilled from the claw of a heel boom loader and was cleaned up and disposed of properly and that the heel boom loader was repaired and no further leaks were observed.

Liberty Utilities notified the CPUC that, on September 4, 2015, a hydraulic leak developed in a drill rotor head. The source of the leak was repaired and the spill was cleaned up and disposed of properly.

Finally, during a compliance monitoring visit on August 28, 2015, Dudek observed tire tracks off of the timber matting set along the ROW within Martis Valley. Liberty Utilities identified that they would use a spotter to help guide drivers when large vehicles travel over the matting. This condition will continue to be verified during subsequent monitoring visits.

CONSTRUCTION PROGRESS

The project has been broken into three phases, as summarized below:

Phase 1 (Rebuild and Upgrade of the 650 Line (Including the Northstar Fold (2015-2016))

Pre-Construction Invasive Weed Treatment (CPUC NTP No. 001)

Pre-construction weed treatment in areas identified in the project's Invasive Plant Risk Assessment document was initiated on July 2, 2015, consistent with APM-BIO-4. Weed treatment activities covered under NTP-1 were completed in July 2015.

650 Line Rebuild (CPUC NTP No. 002)

Project tasks associated with the 650 Line rebuild were initiated on August 10, 2015. During the period covered by this report, the following tasks were completed or initiated: completion of wood matting and temporary timber bridge installation along the ROW through Martis Valley (from Highway 267 to Pole #291040); excavation of pole holes through Martis Valley and those north of Highway 267 (from Pole #291068 to #291087); completion of installation of pole bases in Martis Valley; installation of pole tops in Martis Valley (from Pole #291035 to #291039); setting of pole bases and backfilling for Poles #291035 to #291083; excavation drilling, rebar cage and anchor bolts setting, and concrete pouring for Pole #291101; excavation drilling and foundation pouring for Pole #291105 (tap for Northstar fold); transfer of conductor (transmission and distribution) and re-sagging from Poles #291034 to #291039; anchors installed (Poles #206045, #291039, #291048, #291060, #291061, #291065, #291067 and #291068); pull testing for some poles; setting of pole tops, installation and tension of anchors and guy wire, and stringing of transmission, distribution, and fiber cable (pulled, tensioned, sagged & clipped in) from Poles #291039 to #291068; cutting and laying of top half of existing wooden poles through Martis Valley within the ROW work area in preparation for removal from site; initiation of restoration of sites

where pole bases have been installed; and transfer of existing communications cable from Pole #291034 to #291068 to new steel poles (not yet been fully attached).

The estimated completion date for the 650 Line rebuild is October 2015.

Vegetation Management (Pole 291034 to 291169 and Pole 291105 to Northstar Substation) (CPUC NTP No. 002)

Tree removal activities began on August 31, 2015. Tree removal has been completed between Poles #291101 to just south of Pole #291105. Estimated completion date is mid-October 2015.

Northstar Substation Rebuild (CPUC NTP No. 002)

Not Started. Estimated completion date is October 2015.

Phase 2 (Substation Upgrades, Decommissioning of the Brockway Substation (2017))

Not Started. Estimated completion date is October 2017.

Phase 3 (Upgrade of the 625 Line and Additional Modifications of the Substation (2019-2020))

Not Started. Estimated completion date is October 2020.

CONSTRUCTION SCHEDULE

Phase 1 (Rebuild and Upgrade of the 650 Line (Including the Northstar Fold (2015-2016))

Pre-Construction Invasive Weed Treatment (CPUC NTP No. 001)

Completed in July 2015.

650 Line Rebuild (CPUC NTP No. 002)

Initiated on August 10, 2015, estimated completion date is October 2015.

ATTACHMENT A Photos



Photo 1: Topsoil salvage piles covered with BMPs installed (straw wattles), consistent with APM-BIO-23. Excavated pole holes covered to prevent wildlife from entering holes.

ATTACHMENT A (Continued)



Photo 2: Signage noting that cultural site CA-PLA-006 was closed to construction activity resulting from rock movement conducted without the presence of an archeological monitor, as required by APM-CUL-1. Protocols were followed as outlined in the project's Cultural Resources Protection, Monitoring and Unanticipated Discovery Plan and the area was later re-opened to construction activity following an assessment conducted in coordination with the United States Forest Service (USFS) archaeologist representative.

ATTACHMENT A (Continued)



Photo 3: Cut tree marks painted over with black paint on the SR 267 side of trees. This corrective measure was implemented by CalPeco following notification by the CPUC that road-side cut tree marks were inconsistent with the requirements of APM-SCE-1.

ATTACHMENT A (Continued)



Photo 4: New weathered-steel pole installed at the northwest end Line segment 650-4. Old pole top has been and is laying in the ROW prior to removal from the project site.

ATTACHMENT A (Continued)



Photo 5: Construction crews setting anchors at corner Pole #291068, across SR 267 from Martis Valley. Cultural and environmental monitors present. Water truck nearby for dust control, consistent with APM-AQ-2.

ATTACHMENT A (Continued)



Photo 6: Tree removal activities underway between Poles #291101 and #291105. Silt fence installed along the lower edge of the ROW.

ATTACHMENT B Notices to Proceed

NTP No.	Date Issued	Description	Conditions Included (Y/N)
CPUC-001	July 2, 2015	Pre-Construction Weed Treatment from Martis Tap Pole to Brockway Summit	Y
CPUC-002	August 5, 2015	650 Line Re-Build Between the Martis Tap Pole and the Northstar Substation, Northstar Substation Civil Work, and Vegetation Management Between the Martis Tap Pole and Brockway Summit	Y

ATTACHMENT C Minor Project Refinement Request

Minor Project Refinement Request No.	Submitted	Description	Status	Approval
-	-	-	-	-